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May 29, 1998

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket No. 96-45; CC Docket No. 97-160;
DA 98-715 USF Proposal -- Proposal to Revise
the Methodology for Determining Universal Support

Dear Ms. Salas:

On April 27, 1998, the Puerto Rico Telephone Company ("PRTC") filed a proposal in the above-referenced proceedings requesting, in synthesis, that federal Universal Service support for Puerto Rico be maintained at current levels. PRTC argues that forward looking mechanisms for high cost and long-term support fail to reflect the needs of insular areas.

On May 15, 1998, the Association of Competitive Telecommunications Providers ("APCT") filed comments supporting PRTC's request, but conditioned its support on: (1) the elimination of cross-subsidies by PRTC; (2) that the FCC order PRTC to justify the costs of its services; (3) that the "transition period" requested by PRTC have a definite deadline; and (4) that PRTC be ordered to submit quarterly reports regarding its efforts to eliminate cross-subsidies and bring intransland access charges closer to costs. Sprint, by its counsel, hereby agrees with the position expressed by APCT in its comments.

In addition, regarding the comments filed by PRTC on May 15, 1998, Sprint deems it necessary to clarify PRTC's reliance on the principle stated by Sprint in this proceeding that the implementation of a universal service plan must be revenue neutral at its inception. As it stated earlier in this proceeding, Sprint believes any plan adopted by the Commission should be based on the following five principles:

1. Fund support must be based on forward looking costs;

2. There must be a national fund, assessed on both intrastate and interstate retail revenues;
3. Where a cost-based rate would be prohibitive, a federal benchmark must be established to serve as the maximum affordable local service rate;
4. Implementation of the plan must be revenue neutral at its inception (i.e., any LECs experiencing an increase in explicit high-cost funding must make dollar-for-dollar reductions in access charges); and
5. Contributions to the universal service fund must be recovered from end user customers through a surcharge on all retail services.¹

In its comments, PRTC took the fourth principle propounded by Sprint out of context in an attempt to buttress its position that "universal service should be applied to interstate access charges only when the carrier receives an increase above current universal service high cost support."² The fact is, however, that such principle, as propounded by Sprint, seeks only to prevent LECs from obtaining an increase in revenues as a result of a possible increase in federal funding.

As explained in Sprint's proposal dated April 27, 1998, the purpose of such principle is to assure that the support system adopted "not be capable of manipulation such that carriers are able to turn universal service into a revenue making opportunity."³ Sprint has consistently maintained that the Federal Telecommunications Act requires the replacement of implicit subsidies with explicit funding. PRTC's reliance on Sprint's proposal, therefore, is incorrect and misleading. PRTC also conveniently ignores that the

¹ See Sprint's May 15, 1998, comments at iii (emphasis supplied).

² See PRTC's May 15, 1998, comments at 9.

³ See Sprint's May 15, 1998, proposal at 11.

Ms. Salas

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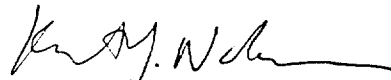
first principle advocated by Sprint is that Universal Service support must be based on forward looking costs.

Furthermore, this Commission should be aware that the government of Puerto Rico has recently announced that PRTC will be sold to GTE and a group of local investors before the end of this year. Given the fact that this transaction will most likely improve PRTC's economies of scale, Sprint submits the Commission should consider the same when ruling upon PRTC's proposal.

Sprint also asks that the Commission compare the USF requirement for Puerto Rico to that of another GTE operating territory -- Hawaii. GTE-Hawaiian Telephone Company more closely resembles PRTC than any other United States LEC -- both Hawaii and Puerto Rico are islands and both have a single ILEC serving the island(s). Hawaii is much more removed from the mainland than is Puerto Rico (i.e., more insular). Further, Hawaii has approximately half as many access lines as Puerto Rico. Despite these differences, PRTC's access rates are in some cases almost three times those of GTE Hawaiian's.

In comparing the level of service and the price of access and local service in the two jurisdictions, the only reasonable conclusion is that PRTC is hugely inefficient. Sprint submits, therefore, that the difference in the quality and price of the services provided in the two territories lies not in the "insular" nature of Puerto Rico, but in the ownership and management of PRTC.

Sincerely,



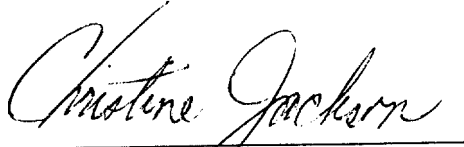
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